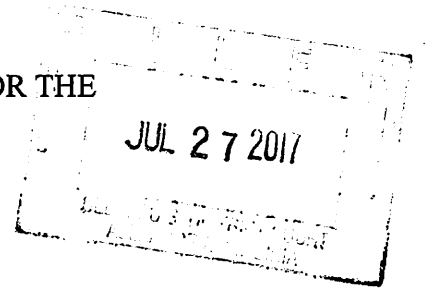


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division



UNITED STATES OF AMERICA

v.

Case No. 1:17-MJ-355

CHRISTOPHER ROBERT SUEIRO,

Defendant

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT & ARREST WARRANT

I, Kimberly Honicker, being duly sworn, depose and state:

1. I am a Special Agent ("SA") with the U.S. Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI") and have been by employed by ICE since 2007. I am currently assigned to the Office of the HSI, Washington, D.C. ("HSI DC") and have investigated child exploitation on the internet since approximately May 2009. I have basic and on-the-job training in this investigative area, and I have participated in federal, multi-jurisdictional, and international investigations in it as well. I graduated from the Federal Law Enforcement Training Center Criminal Investigator Training Program and the ICE Special Agent Training program. Moreover, I have participated in and sworn to numerous search warrants and federal criminal complaints, many of which involved child exploitation and/or child pornography offenses. As part of my current duties as an ICE agent, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C.

§§ 2251, 2252, and 2252A. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media.

2. I submit this affidavit for the limited purpose of establishing probable cause in support of this application for a complaint, and thus it does not contain every fact gathered during the investigation.

APPLICABLE STATUTES

3. This investigation concerns alleged violations of 18 United States Code, Sections 2252 and 2252A, relating to material involving the sexual exploitation of minors.

4. Title 18 U.S.C. § 2252(a)(2) prohibits a person from receiving any visual depiction of minors engaged in sexually explicit conduct.

5. Title 18 U.S.C. § 2252(a)(4)(B) prohibits a person from possessing any visual depiction of minors engaged in sexually explicit conduct.

6. Title 18 U.S.C. § 2252A(a)(2)(B) prohibits a person from knowingly receiving or distributing child pornography.

7. Title 18 U.S.C. § 2252A(a)(5)(B) prohibits a person from possession of materials containing an image of child pornography.

INVESTIGATION OF CHRISTOPHER ROBERT SUEIRO

8. In February 2016, Detective (“Det.”) Leightley, from the City of Fairfax Police Department, contacted me regarding findings observed during a forensic examination of electronic media seized from one Christopher Robert SUEIRO (hereafter “SUBJECT”).

9. According to Det. Leightley, in November 2014, Prince William County (“PWC”) police department initiated an investigation of SUBJECT after receiving a report that a

PWC resident had received threatening emails from SUBJECT. The email address used by SUBJECT to send the emails was "Christopher.777@mail.com".

10. Based on the content of the threatening emails, PWC obtained an arrest warrant for a felony violation of Virginia Code § 18.2-60, which prohibits threats of death or bodily injury to a person or member of their family. On November 5, 2014, the Fairfax County Police Department executed an arrest warrant at the residence the SUBJECT rented in Fairfax, VA.

11. On November 7, 2014, Det. Leightley obtained and executed a state search warrant for the SUBJECT's residence. Fairfax County police officers seized numerous items, including several electronic media devices. On November 13, 2014, Det. Leightley obtained a separate search warrant to conduct a forensic examination of the electronic media to search for evidence pertaining to the threatening emails. Det. Leightley executed this search warrant on November 17, 2014.

12. On November 18, 2014, during the forensic examination of the seized electronic media for evidence related to the threats SUBJECT made, Det. Leightley observed numerous images of suspected child pornography, including images of prepubescent males in various stages of undress and displaying their genitalia. Upon finding this evidence, Det. Leightley ceased his search and obtained an additional search warrant authorizing the search of the devices for violations of the Virginia Code § 18.2-374.1:1, which prohibits the possession, reproduction, distribution, solicitation, and facilitation of child pornography.

13. On February 16, 2015, the owner of the residence the SUBJECT had been renting prior to his arrest was cleaning out the SUBJECT's belongings. On a coffee table in the living room, the owner found an external hard-drive (a Western Digital External HD SN: WCAZAC775833). The hard-drive was in an Amazon shipping box next to SUBJECT's

backpack. The owner connected the external hard-drive to his personal computer. The owner then observed what he later described to Det. Leightley as “illegal content” on that hard-drive in a folder labeled “My Pictures”. The pictures appeared to be child pornography; they depicted prepubescent males in various states of undress and exposing their genitalia. The owner disconnected the external hard-drive, contacted Det. Leightley, and brought the hard-drive to the City of Fairfax Police Department. The external hard-drive was placed into property as evidence. On April 26, 2016, Det. Leightley obtained a search warrant for the Western Digital External HD (SN: WCAZAC775833) authorizing a search for evidence of violations of the Virginia Code § 18.2-374.1:1.

14. Based on the initial forensic findings of SUBJECT’s media devices, on June 22, 2016, the Honorable Magistrate Judge Michael S. Nachmanoff of the Eastern District of Virginia issued a federal search warrant for all of the SUBJECT’s media in the custody of the City of Fairfax Police Department for suspected child exploitation offenses.

15. Each seized device was found to contain child exploitation-related material and suspected child pornography. Examples of the material found on each device follow:

a. Western Digital External Hard Drives:

i. **Hard-drive Serial Number (“SN”):** WCAZA2754648T:

FILE NAME: PJK 3 blonde 12yo boy gets it up the ass

2MB.MPG

DESCRIPTION: video depicts three nude suspected minor males engaged in sexual activity, including both oral and anal sex.

ii. **Hard-drive SN:** WCC4N121520:

FILE NAME: Two 17yoBoys PLAYS GAME RAPE with a 12yo Boy+.jpg

DESCRIPTION: three nude suspected minor males engaged in sexual activity.

iii. **Hard-drive SN:** WCAZAC775833

FILE NAME: Lilboysblowjob.jpg

DESCRIPTION: two nude suspected minor males engaged in oral sex.

b. Dell Laptop Latitude D160 (Service Tag 2VLWY81):

FILE NAME: boys- naked-little-04_(1).jpg_bv1405237758.jpg

DESCRIPTION: two suspected minor males lying nude on a bed.

c. Dell Laptop Latitude D610 (Service Tag HPJ4391):

FILE NAME: PJK9_11.JPG

DESCRIPTION: two suspected minor males lying nude on a bed. One suspected nude minor male is performing oral sex on the other.

d. Dell Laptop Latitude D610 (Service Tag 6PXCY71):

FILE NAME: PJK9_5.JPG

DESCRIPTION: two suspected minor males lying nude on a bed. One suspected nude minor male is performing oral sex on the other.

16. A forensic examination of the Dell Laptop (Service Tag 2VLWY81) indicated

SUBJECT created a .txt file named “[Minor J’s]¹ Address.txt” on September 25, 2014, at 6:32:48 PM Eastern Time (“ET”). The document was located in file path: Documents and Settings\Dell User\My Documents\[Minor J’s] Address.txt. The document included SUBJECT’s contact information (name, address, e-mail address, and phone number) as well as Minor J’s contact information. On December 11, 2014, Det. Leightley made contact with Minor J’s mother who described SUBJECT as a “family friend.” Queries of a law enforcement database verified in 2014 that Minor J was a juvenile and corroborated the contact information observed in SUBJECT’s .txt document. The document also contained a credit card number associated with SUBJECT.

17. The forensic analysis also indicated that the SUBJECT came into possession of the following images of suspected child pornography around the same time that the above-mentioned .txt file was created:

a. **File Name:** AustinJ_03Dec20_06.jpg_bv1405532822.jpg

File Creation Date: 09/25/14 at 6:40:06 PM ET

File Path: C:\Documents and Settings\Dell User\My Documents\My Pictures\AustinJ_03Dec20_06.jpg_bv1405532822.jpg

File Description: a prepubescent male minor is lying on his back wearing a white shirt and white colored with red figures on boxer shorts. An adult male’s left hand is pulling down the front of the boxers exposing the prepubescent male’s penis.

b. **File Name:** de184948cadae2c1307a081c36bb6e26.jpg_bv1405522152.jpg

File Creation Date: 09/25/14 at 6:12:44 PM ET

File Path: C:\Documents and Settings\Dell User\My Documents\My Pictures\de184948cadae2c1307a081c36bb6e26.jpg_bv1405522152.jpg

¹ Some information in this affidavit has been redacted to protect the privacy of third parties and/or suspected minors or persons who were minors at the time of the events discussed.

File Description: a prepubescent male minor is fully nude sitting up with his fists under his bent knees. He is holding his legs up and spread apart fully exposing his genitalia and anus.

18. Forensic examination of the Dell Laptop (Service Tag 2VLWY81) revealed a document located in file path: C:\Documents and Settings\Dell User\My Documents\Questions of a newb on Darknet.doc. Entitled "Questions of a newb on Darknet.doc", and created on September 09, 2014, at 5:45 PM ET, the document contained the following content:

- a. "I'm totally new to the Darknet and I just now found this site after finding The Hidden Wiki. I already have a whole lot of boy pictures and videos that I got off of WinMX, but I'm looking for a better and faster way to get them because WinMX is way too slow and it can take forever just to actually *start* downloading a file."
- b. "Anyway, I'm confused as to how to download the videos, and I'm also confused because when I made my account on her[e]² just now, in the terms and conditions or whatever, it said that you're not allowed to post any videos that would be considered "illegal", so I don't understand how the n we're supposed to upload and download videos here since everywhere in this damned corrupted world child porn is considered illegal."
- c. "There has to be some way that it's done here, or otherwise I don't understand the point of this site since it is called Boy Vids."

² All spelling and grammar errors are set forth as contained in the original communications unless otherwise indicated in brackets.

19. Forensic examination of the Dell Latitude (Service Tag HPJ4391) revealed a .txt document located via file path C:\Documents and Settings\Paladin\My Documents\Did you happen to find that original video and download it with KeepVid.doc. The document was titled "Did you happen to find that original video and download it with KeepVid.doc", and it contained a description of a video depicting a minor male engaging in sexual intercourse with an adult female and a request for said video. The .txt file's creation date was February 19, 2013. Several statements from this document include the following:

- a. "Video of 4 year-old boy having sex with grown woman?"
- b. "Did you happen to find that original video and download it with KeepVid.com or something? And if you do have it, could you please send it to me? My E-mail address for stuff like this is lover_of_heavenly_boys@yahoo.com."
- c. "I read where someone said they saw the video and that the little boy was "thrusting" his little dick into the woman's pussy. Obviously, if *he's* thrusting his little dick into her, then *he's* actively having sex with her. Obviously he wanted to do it and it probably felt great to the little guy."
- d. "But I already know that no matter how much logic you try to present to brainwashed fools, they will never see past what the programming of their brainwashing says because hopeless are the ones that are so successfully and easily brainwashed into believing such nonsense as that "children are incapable of willingly engaging in sexual activity and therefore anytime they do they must be being raped". I still don't understand how so many idiots can actually believe that that's true."

20. Forensic examination of the Western Digital external hard-drive (Serial # WCAZAC775833) revealed a document located in file path: C:\Everything Else\C Drive For Second Computer\Documents and Settings\Paladin\My Documents\BoyManiaE-mail_TryToSendLater.sxw. The document was titled "BoyManiaE-mail_TryToSendLater.sxw". It was created on September 03, 2012, at 9:10AM and contained the following content:

- a. "Hey, I love your site! As you can tell by my E-mail address, I'm very much a boy lover too."
- b. "I found your site when searching Google for images of "preteen boys", and I came into your site through the picture you have in your gallery with the two beautiful boys, one with dark hair and the other blond, laying with each other in bed. Judging by the name of the file, I *think* this is one from a nude series, but this obviously one of the pictures where it shows them still with something on."
- c. "Oh, and I see you have a big picture [of] that cute little boy Richie on the home page too. I came across a series of photos of him one time when I was looking on that file-sharing program called WinMX, which is what I've used to get pretty much all of my boy pictures and videos."
- d. "Unfortunately there weren't any of him totally nude, but there were some that were close, like the one you have displayed here. My favorite one of him is that one where he's wearing that same red-and-white-striped underwear and he's laying down on his back and looking over at the camera. I love that picture the most because there's nothing covering up his *beautiful* boyish beauty except for that one little thing of underwear,

and that's barely covering him as it is, and because of how he's laying down on his back, I like to imagine me being there with him and untying the strings to that underwear and pulling it off of him completely, revealing his beautiful little boy sack and dick, and then I'd kiss all over him from head to toe and then slowly work my way back up to his beautiful little boy cock and kiss it and lick it all over and then finally take the whole thing, balls included, into my mouth and lovingly suck him off until I made him orgasm in my mouth, hopefully causing him to squirt some of that yummy, clear, sticky, premature boy cum into my mouth, but even if he couldn't squirt out anything at all yet, just feeling his beautiful little boy dick twitching in my mouth as he orgasms would be satisfaction enough."

21. As corroborated by numerous documents located on SUBJECT's electronic media, like those discussed above, forensic examination of said media revealed that the SUBJECT used the peer-to-peer file sharing program WinMX to receive suspected child pornography materials. The program was installed on two items of evidence associated with SUBJECT. The forensic examination revealed that the SUBJECT installed WinMX (version 3.53) on the Dell Laptop (Service Tag 2VLWY81) using the screen name: "Trade4LittleBoys552" and on the Dell Latitude (Service Tag HPJ4391) using the screen name "MXMonitrade4Boys822". Forensic examination of this version of WinMX revealed that users' screen names are displayed to other WinMX users when that user is downloading files from those users. Forensic examination also revealed that the SUBJECT had viewed images of suspected child pornography that he received using WinMX. Specifically, the examination

revealed that, on the Dell Latitude (Service Tag HPJ4391), Media Player Classic (Version 1.6.6.6584) was installed. Below are listed examples of files found in both the WinMX incoming file location and the Media Player Classic recent file list, indicating that files of suspected child pornography were received and viewed on the device:

a. **File Name:** 10yo Girl Fuck (sound).mpg

File Creation Date: October 25, 2012

File Path: C:\Documents and Settings\Paladin\My Documents\WinMX Files Unfinished\10yo Girl Fuck (sound).mpg

File Description: The video file is approximately 5 minutes 55 seconds in length. The video begins with a female lying on her back wearing white panties and a black top. A hand enters the screen and begins using a thumb and fingers to rub the girl's pubic area. At approximately 18 seconds the hands remove the minor female's panties. The girl's small hips and genitalia are exposed, and no pubic hair is visible. The camera zooms in on the prepubescent girl's genitalia and the hand enters the screen and digitally begins touching/penetrating her vagina. At 1min 13 seconds an adult male uses his erect penis to penetrate the prepubescent minor's vagina. The adult male engages in sexual intercourse with the girl. At 5 min 11 seconds, the girl is lying on her back with her legs spread and knees to her chest fully exposing her genitalia and the camera zooms in on her genitalia.

b. **File Name:** 2cute little boys suck man&he cums_wow5+++mpg

File Creation Date: October 25, 2012

File Path: C:\Documents and Settings\Paladin\My Documents\WinMX Files Unfinished\2cute little boys suck man&hecums_wow5+++mpg

File Description: The video file is approximately 5 minutes 43 seconds in length. It begins with a fully nude minor male lying on his back as another male is performing oral sex on him. The minor male has an undeveloped chest, and no visible pubic hair. The camera focuses in on the minor male's genitalia and anus. At approximately two minutes, the video shows, what appears to be, a minor male performing oral sex on an adult male then a second minor male enters the frame to perform oral sex on the adult male. The adult male ejaculates and the boys wipe his penis with an orange towel. The video transitions to two fully nude minor males lying

face down on a bed with their legs spread and buttocks raised, fully exposing their anus. One of the minor male's masturbates what appears to be an adult's penis near one of the minor's buttocks.

c. **File Name:** [—m~F] kdv rbv Crimea (11m55s) -pthc awesome.mpg

File Creation Date: October 21, 2012

File Path: C:\Documents and Settings\Paladin\My Documents\WinMX Files Unfinished\[—m~F] kdv rbv Crimea (11m55s) -pthc awesome.mpg

File Description: The video file is approximately 11 minutes 55 seconds in length. It begins with what appears to be two fully nude male minors lying in bed kissing. The boys fondle each other's genitalia before performing oral sex on each other. At approximately six minutes, one minor male inserts his penis in the other minor's anus and engages in anal sex for the remainder of the video.

22. Forensic examination also revealed evidence indicating that suspected child pornography files were downloaded using WinMX on the Dell Latitude (Service Tag HPJ4391) and then transferred to SUBJECT's Western Digital external hard-drive (SN: WCAZA2754648T). Below are examples of transferred files:

a. **File Name:** 2011 [MB] [TODDLER] 3yo Jay (w cum) (very good).avi

File Creation Date: October 22, 2012

Original File Path: C:\Documents and Settings\Paladin\My Documents\WinMX Files Unfinished\2011 [MB] [TODDLER] 3yo Jay (w cum) (very good).avi

External Device Path: \\WinMX Files From Main Computer\WinMX files\

File Description: The video file is approximately 4 minutes and 2 seconds in length. The video begins with an adult male's penis touching a prepubescent male's penis. No pubic hair is visible on the minor male and his hips are not developed. The adult male rubs his penis on the boy's until the adult male ejaculates on the child's stomach.

b. **File Name:** !NEW!-Jim_12yr old Boy & Man.avi

File Creation Date: October 22, 2012

Original File Path: C:\Documents and Settings\Paladin\My Documents\WinMX Files Unfinished\!NEW!-Jim_12yr old Boy & Man.avi


External Device Path: \\WinMX Files From Main Computer\WinMX files\

File Description: The video file is approximately 11 minutes and 57 seconds in length. The file begins with a boy fully clothed standing next to a bed. He removes his clothing. The camera focuses on his genitals. No pubic hair is visible. The prepubescent male begins to masturbate himself. A nude adult male is observed in the bedroom. At approximately 7 minutes, the adult male begins to perform oral sex on the boy. Then the adult male begins to masturbate himself. At approximately 9 minutes and 19 seconds, the prepubescent minor performs oral sex on the adult male then begins to masturbate the adult male. The recording ends with the adult male performing oral sex on the prepubescent male.

23. Forensic examination revealed that the SUBJECT's collection was primarily of child exploitation and suspected child pornography depicting prepubescent boys. The examination revealed approximately 26,000 images and 500 videos of suspected child pornography on the SUBJECT's devices. Images and videos were submitted to the National Center for Missing & Exploited Children ("NCMEC") for analysis. The NCMEC report identified more than 1,600 image files and 80 video files contained on the SUBJECT's devices that depicted child victims identified by law enforcement officers in previous investigations.

CONCLUSION

16. Wherefore, I respectfully request that this Court issue a criminal complaint charging CHRISTOPHER ROBERT SUEIRO with violations of Title 18 U.S.C. §§ 2252(a)(2) and a warrant authorizing his arrest.



Kimberly A. Honicker
Special Agent
Homeland Security Investigations

Sworn and subscribed before me
this 24th day of July 2017

/s/
Theresa Carroll Buchanan
United States Magistrate Judge

Honorable Theresa Carroll Buchanan
UNITED STATES MAGISTRATE JUDGE